

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster

**THE AHOLD DELHAIZE DEFENDANTS’ UNOPPOSED MOTION TO EXTEND
DEADLINE TO OPPOSE PLAINTIFFS’ MOTIONS FOR LEAVE TO AMEND**

The “Ahold Delhaize Defendants” as defined by Plaintiffs¹ (“AD”), by and through undersigned counsel, respectfully move this Court to extend the deadline to file opposition (“Opposition”) to Plaintiffs’ Omnibus Motion for Leave to Amend to add the AD defendants, see, e.g., ECF No. 5566 (“Motion to Amend”), to **December 6, 2024**.

AD’s Opposition currently is due September 30, 2024, and this is AD’s first request for an extension. On August 16, 2024, certain defendants in this matter (“Moving Defendants” in ECF No. 5590, here, “Certain Defendants”) moved for the same extension now requested by AD (“Motion for Extension”). This Court granted Certain Defendants’ Motion for Extension on August 19, 2024. August 19, 2024, Paperless Order.

AD now moves for the same extension this Court granted to Certain Defendants. Plaintiffs’ Executive Committee (“PEC”) has advised undersigned counsel it does not oppose AD’s extension request. In making this extension request, AD asserts and relies upon in the reasoning and

¹ In their Corrected Omnibus Motion for Leave to Amend to Add Ahold Delhaize Defendants Plaintiffs define the Ahold Delhaize Defendants as: “Koninklijke Ahold Delhaize N.V.; Ahold Delhaize USA, Inc.; Ahold U.S.A., Inc.; American Sales Company LLC; ADUSA Distribution, LLC f/k/a Delhaize America Distribution LLC; Food Lion, LLC; The Giant Company LLC f/k/a Giant Food Stores, LLC; The Stop & Shop Supermarket Company LLC; and Hannaford Bros. Co., LLC. This motion refers to these three Defendants collectively as “Ahold Delhaize” or the “Ahold Delhaize Defendants.”

arguments articulated by Certain Defendants in their Motion for Extension. ECF No. 5590. Specifically, the number of plaintiffs seeking to amend complaints to add AD entities (147), warrants this extension. For these reasons and those set forth in Certain Defendants' Motion for Extension, AD respectfully requests that this Court grant its extension request.

Dated: August 26, 2024

Respectfully submitted,

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